

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-HARVARD
FACULTY CHAPTER,

AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS AT NEW
YORK UNIVERSITY,

RUTGERS AMERICAN ASSOCIATION OF
UNIVERSITY PROFESSORS-AMERICAN
FEDERATION OF TEACHERS, and

MIDDLE EAST STUDIES ASSOCIATION,

Plaintiffs,

v.

MARCO RUBIO, in his official capacity as
Secretary of State, and the DEPARTMENT
OF STATE,

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, and the
DEPARTMENT OF HOMELAND
SECURITY,

TODD LYONS, in his official capacity as
Acting Director of U.S. Immigration and
Customs Enforcement,

DONALD J. TRUMP, in his official capacity
as President of the United States, and

UNITED STATES OF AMERICA,

Defendants,

Civil Action No. 1:25-cv-10685

**[PROPOSED] BRIEF OF AMICUS CURIAE THE PRESIDENTS' ALLIANCE ON
HIGHER EDUCATION AND IMMIGRATION IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION**

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INTEREST OF *AMICUS CURIAE*

Amicus curiae the Presidents’ Alliance on Higher Education and Immigration (the “Alliance”) submits this brief to advise the Court of the effects of the administration’s policy of targeting non-citizen students and faculty at institutions of higher education throughout the country based on their political views.¹ The Alliance is uniquely positioned to do so. It consists of over 570 presidents and chancellors of colleges and universities who lead institutions public and private, large and small, urban and rural, faith-based and secular, across the country. These institutions collectively educate over five million of the approximately eighteen million post-secondary students in the United States and contribute to our nation’s economic growth, innovation, and national security. The Alliance is dedicated to increasing public understanding of the impact of immigration policies on higher education, supporting policies that encourage international students and scholars to enrich American institutions of higher learning, and ensuring a talent pool that contributes to our communities and nation. It has a strong interest in explaining the policy’s effects.

The following 86 institutions and associations support the Alliance’s filing of this brief:

| | | |
|--|----------------------------------|----------------------------|
| AIRC: The Association of International Enrollment Management | Gustavus Adolphus College | Santa Clara University |
| Amherst College | Hamilton College | Scripps College |
| Antioch College | Hamline University | Seattle University |
| Association of Catholic Colleges and Universities | Harold Washington College | Smith College |
| Association of International Education Administrators (AIEA) | Haverford College | Soka University of America |
| Augsburg University | Hofstra University | St. Catherine University |
| | Illinois Institute of Technology | St. Lawrence University |
| | Loma Linda University | St. Olaf College |
| | Loyola University Maryland | Suffolk University |
| | | Swarthmore College |

¹ No counsel for a party authored this brief in whole or in part, and no counsel or party made a monetary contribution intended to fund the preparation or submission of this brief. No person other than *amicus curiae* made a monetary contribution to the preparation or submission of this brief.

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|---|---|---|
| Augustana College | Macalester College - Saint Paul, MN (MBR) | The College of St Scholastica |
| Bard College | | The College of Wooster |
| Bates College | Maine College of Art and Design | The President & Fellows of Middlebury College |
| Bennington College | Marymount University | The President and Trustees of Colby College |
| Bentley University | Maryville College | |
| Carleton College | Michigan State University | Toyota Technological Institute at Chicago |
| Clark University | Mount Holyoke College | |
| College of Saint Benedict and Saint John's University | MSU Denver | Trinity College (CT) |
| College of the Atlantic | Naropa University | Trinity Washington University |
| Concordia College | National Association for College Admission Counseling | Trustees of the College of the Holy Cross |
| Concordia University St. Paul | Northern Illinois University | University of Dayton |
| Delaware State University | Notre Dame de Namur University | University of Maryland Eastern Shore |
| Dominican University | | |
| Donnelly College | Occidental College | University of Redlands |
| Eastern Oregon University | Oregon State University | University of San Diego |
| Edgewood College | Pacific Lutheran University | University of St. Thomas |
| Foothill-De Anza Community College District | PEN American Center, Inc. | University of the West |
| Fordham University | Pitzer College | University System of Maryland |
| Georgetown University | Pomona College | |
| Gonzaga University | Reed College | Wesleyan University |
| Goucher College | Regis University | Western Oregon University |
| Grinnell College | Riverside Community College District | Williams College |
| | Rutgers, The State University of New Jersey | |

PRELIMINARY STATEMENT

The policy has created a climate of fear among non-citizens at American colleges and universities. The administration has made high-profile arrests of non-citizens based on their political views, revoked the visas of hundreds of international students, and terminated foreign students' records in the Student Visitor and Exchange System ("SEVIS"). It is also threatening the ability

of schools to enroll any foreign students at all through decertification under the Student Exchange and Visitor Program (“SEVP”). Seeing these actions, non-citizen students and faculty report being scared that they, too, will be targeted by the administration. As Tufts University said recently: “In the worst cases, many [foreign students] report being fearful of leaving their homes, even to attend and teach classes on campus.”² This fear extends beyond non-citizens who have expressed pro-Palestinian views; many are afraid of expressing any political views contrary to those of the current administration for fear of reprisal.

This climate of fear will repel international students, scholars, and other non-citizens from attending or teaching at American colleges and universities—all of which will harm the United States in multiple ways. Reduced non-citizen enrollment in American schools will harm American students, who will be denied the educational benefits of learning with and from citizens of other countries. It will harm American colleges and universities too, as they lose those educational benefits and lose enrollments, faculty, and tuition. It will harm the American economy, limiting the economic contributions made by hundreds of thousands of non-citizens. Because of the high concentration of non-citizens in scientific and technological fields, it will hurt American research and innovation. And it will exacerbate the troubling trend of top foreign students choosing non-US institutions over American schools—handing a competitive advantage to other countries.

This reality exposes the policy’s underlying premise as false. The policy presumes that it will benefit the United States while harming only those non-citizens whom the administration disfavors. In fact, in the long run, the policy will benefit other countries—by encouraging ever more non-citizens to attend foreign schools instead of American schools—and it will grievously harm

² *University Declaration for Rümeysa Öztürk*, Tufts Univ. (Apr. 2, 2025), <https://tinyurl.com/yck9pa8y>.

the United States, by depriving this country of the many benefits that non-citizens at American colleges and universities provide and by diminishing American higher education.

ARGUMENT

I. THE ADMINISTRATION’S POLICY HAS CREATED A CLIMATE OF FEAR AMONG NON-CITIZENS AT U.S. COLLEGES AND UNIVERSITIES

A. The President’s Executive Orders and the Administration’s Actions

Shortly after taking office, the President issued two executive orders relating to non-citizens at United States post-secondary institutions.³ The administration has since arrested several non-citizens involved with higher education based on their purported political views, including (1) Mahmoud Khalil, a recent graduate of Columbia University’s School of International Public Affairs;⁴ (2) Badar Khan Suri, an Indian scholar at Georgetown University whose research focuses on peacebuilding in the Middle East;⁵ and (3) Rümeyza Öztürk, a Turkish Ph.D. student at Tufts University and Fulbright scholar.⁶

The administration has also revoked the visas or statuses of and initiated removal proceedings against many non-citizens based on their purported roles in on-campus political advocacy, including Yunseo Chung, a US permanent resident and junior at Columbia University, and Ranjani Srinivasan, an Indian citizen and Fulbright recipient attending Columbia’s Graduate School of Architecture, Planning and Preservation.⁷

³ Compl. ¶¶ 25-29.

⁴ Karina Tsui, *What We Know About the Federal Detention of Activists, Students and Scholars Connected to Universities*, CNN (Apr. 2, 2025), <https://tinyurl.com/359wbssz>.

⁵ *Id.*

⁶ Gloria Pazmino et al., *What We Know About the Tufts University PhD Student Detained by Federal Agents*, CNN (Mar. 28, 2025), <https://tinyurl.com/bdcwb4cs>

⁷ Tsui, *supra* note 4.

In some cases, there is no clear link between the targeted non-citizen's political activity and their visa revocation. For example, University of Alabama mechanical engineering graduate student Alireza Doroudi was arrested and detained by ICE agents on March 25, 2025, although there is "no evidence" that he was involved in pro-Palestinian advocacy on campus.⁸ As of April 8, 2025, the administration has revoked the status of over 500 non-citizens, including many international students, in some cases based on alleged participation in campus activism or social media activity deemed contrary to administration policies.⁹ The Secretary of State said of these revocations: "If [non-citizens are] taking activities that are counter ... to our national interest, to our foreign policy, we'll revoke the visa,"¹⁰ without explaining what actions the administration believes are contrary to the nation's interests or its foreign policy. According to media reports, the administration uses artificial intelligence to identify possible infractions, including by scraping the social media accounts of non-citizens.¹¹

The administration has cancelled the visas of many foreign students without notifying the colleges or universities that they attend.¹² Administrators at Minnesota State University, for example, learned that the visas of five students had been revoked only after running a status check in a

⁸ Patrick Darrington, *Video Captures ICE Agents Detaining Alireza Doroudi, Iranian Born Alabama Doctoral Student*, AL.com (Apr. 4, 2025), <https://tinyurl.com/3vmwuepu>.

⁹ Andrew Jack, *US revokes more than 500 foreign student visas*, FT (Apr. 8, 2025) <https://tinyurl.com/4rz4wzpt>.

¹⁰ Press Release, U.S. Department of State, *Secretary of State Marco Rubio Remarks to the Press* (Mar. 28, 2025), <https://tinyurl.com/3hkz2cum>.

¹¹ Marc Caputo, *State Dept. to Use AI To Revoke Visas of Foreign Students Who Appear 'Pro-Hamas'*, Axios (Mar. 6, 2025), <https://tinyurl.com/bdas984h>.

¹² Collin Binkley et al., *Federal Officials are Quietly Terminating the Legal Residency of Some International College Students*, Associated Press (Apr. 4, 2025), <https://tinyurl.com/3wbhda83>.

database of international students.¹³ The Alliance has received reports that the government has revoked hundreds more visas without providing any basis for its decision.¹⁴

The administration is also terminating the SEVIS student record of the students whose visas it revokes—a change from prior practice, under which students with revoked entry visas retain their status and could remain in the country as long as they were enrolled in courses.¹⁵ By terminating the students’ SEVIS record, the administration appears to be paving the way to arrest and deport them.¹⁶

The administration is also threatening higher education institutions’ ability to enroll any foreign students. Under SEVP, certified post-secondary institutions may issue eligibility certificates to prospective international students (which the students may use to apply for student visas) and enroll them after they enter the country.¹⁷ In the past, the government has decertified institutions that it determined were issuing too many certificates as a ruse to enable students to live and work in the United States.¹⁸ The administration now threatens to decertify schools that it determines have “too many bad apples in one place,” including those whom the administration deems

¹³ *Id.*

¹⁴ See also Vimal Patel, *Nearly 150 Students Have Had Visas Revoked and Could Face Deportation*, NY Times (Apr. 7, 2025), <https://tinyurl.com/6vcjrv62>

¹⁵ See Liam Knox, *Smashing the Student Visa System*, Inside Higher Ed (Apr. 3, 2025), <https://tinyurl.com/pcjy94bt>; Juliet Schulman-Hall, *Trump Administration Revokes Visas of 5 UMass Amherst Students*, MassLive (Apr. 5, 2025), <https://tinyurl.com/34tcanws>; Jaweed Kaleem, *Trump Administration Cancels Dozens of International Student Visas at University of California, Stanford*, Los Angeles Times (Apr. 5, 2025), <https://tinyurl.com/43xjf23z>.

¹⁶ *Id.*

¹⁷ *Getting Started with SEVP Certification*, U.S. Department of Homeland Security, <https://tinyurl.com/2p9uru88>.

¹⁸ Caputo, *supra* note 10.

as holding pro-Hamas views.¹⁹ “I don’t think we’re at that point yet,” said a U.S. official, “[b]ut it is not an empty threat.”²⁰ If the administration revokes a school’s SEVP certification, that school will no longer be able to admit any foreign students.²¹

B. The Administration’s Actions Sow Fear and Uncertainty Across Post-Secondary Institutions

The administration’s actions have created a climate of fear among non-citizen students on campuses across the country. Several non-citizen students targeted by the administration, fearing reprisals if they challenged their visa revocations, have opted to leave the United States instead. Rajani Srinivasan, an Indian graduate student at Columbia, left the country after the administration revoked her visa and ICE agents appeared at her door without a warrant. “The atmosphere seemed so volatile and dangerous,” she said, “[s]o I just made a quick decision.”²²

Non-citizen students wonder whom the administration will target next. A British student at Harvard University said: “There is a concern amongst international students—and there were many international students who did participate in pro Palestinian activities on campus—that they could be targeted by the Trump administration and made an example of through deportation, and that Harvard will not have the power to stop that.” She continued: “As an international student,

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² Luis Ferré-Sadurni & Hamid Aleaziz, *How a Columbia Student Fled to Canada After ICE Came Looking for Her*, N.Y. Times (Mar. 15, 2025), <https://tinyurl.com/5n83bn4z>; see also Tsui, *supra* note 4 (listing other non-citizen students who have left the United States).

you can imagine that’s very scary to know that at any point in time, your future outlook and what you had imagined for yourself can go away overnight.”²³

Non-citizens at Columbia University said that “they feel they must be careful who they speak to and censor what they say. They fear being questioned by [ICE] agents, having their visas revoked or being arrested and detained. Some feel like they are being watched while walking around Morningside Heights and on campus[.]”²⁴ An Indian student said: “What scares me the most is that I would be fast asleep at home and I would hear a bang on my door and I’d be taken away in the middle of the night by [ICE] and nobody will ever know what happened to me. ... It feels as if people are getting targeted for just speaking up for their political views last year.”²⁵ A Russian master’s student likened the atmosphere on campus to that in Russia when police were “knocking on doors to draft male citizens at the start of the Russia-Ukraine war. ... ‘[I]t feels like “the police state is coming after you.”’²⁶

This fear is pervasive. “There is a palpable sense of fear among international students on campus,” said the director of Columbia University Law School’s Immigrants’ Rights Clinic, which has been “inundated with requests for legal consultation.” She continued: “They are worried about what may happen to their student visas. They are concerned that they may not be able to complete their degree programs if they are targeted. They’re wondering how they can make changes to their

²³ Samuel A. Church & Cam N. Srivastava, *As Trump Floats New Travel Restrictions, International Students Look for Guidance from Harvard*, The Harvard Crimson (Mar. 13, 2025), <https://tinyurl.com/nhhxzhve/>.

²⁴ Jazzmin Jiwa, *‘I could be next’: International Students at Columbia University Feel ‘Targeted’ After Mahmoud Khalil’s Arrest*, The Guardian (Mar. 19, 2025), <https://tinyurl.com/2t82svy4>.

²⁵ *Id.*

²⁶ *Id.*

daily life to reduce the risk.”²⁷ After two Saudi Arabian students at North Carolina State University who were both “in good standing” on campus decided to leave the country following the administration’s revocation of their visas, the school’s chancellor stated: “the university’s international students are ‘very concerned’ about the revocations of visas taking place around the country.”²⁸ After a student at Temple University also opted to leave the country after their visa was revoked, Temple’s president similarly said: “News like this is distressing and frightening, especially for international members of our community.”²⁹ Following Öztürk’s arrest, Tufts University said: “In the worst cases, many [foreign students] report being fearful of leaving their homes, even to attend and teach classes on campus.”³⁰

Non-citizens fear being targeted for expressing any views contrary to those of the administration. A South Asian graduate student at the University of Rochester said: “it feels too risky to speak about LGBTQ+ causes ... or even be seen near a political demonstration.”³¹ A chemistry professor living in Canada recently turned down an invitation to attend a conference in the United States, fearing “that because of her vocal support of diversity, equity, and inclusion (DEI) initiatives—a target of the Trump administration—she will be hassled by border guards.”³² One

²⁷ Liam Knox, *‘Palpable Fear’ Hangs Over International Students*, Inside Higher Ed (Mar. 18, 2025), <https://tinyurl.com/y85jh578>.

²⁸ Korie Dean, *NC State Students Who Lost Visas were in ‘Good Standing’ with University, Chancellor Says*, The News & Observer (Apr. 3, 2025, 1:11 PM), <https://tinyurl.com/pdn6rcnx>.

²⁹ Susan Snyder, *Temple Student Whose Visa was Revoked has Self-deported, University Says*, Philadelphia Inquirer (Apr. 2, 2025), <https://tinyurl.com/4vabmnzy>.

³⁰ Tufts University, *supra* note 2.

³¹ Carolyn Thompson, *International Students Weigh New Risks of Pursuing Higher Education in the US Under Trump*, Associated Press (Mar. 25, 2025, 12:14 AM), <https://tinyurl.com/4u266tn6>.

³² Katie Langin, *International Scientists Rethink U.S. Conference Attendance*, Science (Mar. 31, 2025), <https://tinyurl.com/3b58ybd2>.

Alliance member institution reports that visa-holders fear majoring in certain subjects, taking specific classes, and facing backlash from prior art exhibits. Even student newspapers are anonymizing non-citizen sources and journalists who risk immigration consequences, in some cases pausing publication or deleting existing articles.³³ As one editor of a campus outlet said: “For students who disagree with the Trump administration’s stance, they fear real retaliation.”³⁴

II. THIS CLIMATE OF FEAR WILL REPEL NON-CITIZENS FROM ATTENDING U.S. COLLEGES AND UNIVERSITIES, THREATENING U.S. INTERESTS

The policy threatens to significantly reduce the number of foreign students and other non-citizens seeking to attend U.S. post-secondary institutions. The executive director of the Association of International Enrollment Management (“AIRC”), an organization focused on recruiting and enrolling international students, said: “It has a chilling effect[.] ... [A]ll of this cumulatively produces an impression that the U.S. is not welcoming, it’s not open or that you may be in some kind of danger or jeopardy if you do come to the U.S.”³⁵ AIRC reports a consensus among recruiting agencies in India, the largest source of foreign students coming to the United States, that “far fewer of that country’s students are interested in American colleges than in recent years.”³⁶

Available data show that foreign student interest in attending American schools has plummeted since the policy went into effect. StudyPortals, an online portal used by 55 million prospective international students from 240 countries to learn about and apply to international programs, reports that the demand for international graduate students to study in the United States “has

³³ Anvee Bhutani, *US Student Journalists Go Dark Fearing Trump Crusade Against Pro-Palestinian Speech*, The Guardian (Apr. 7, 2025), <https://tinyurl.com/mtzvpa2w>.

³⁴ *Id.*

³⁵ Thompson, *supra* note 31.

³⁶ *Id.*

dropped a dramatic 42% since the beginning of the year.”³⁷ A March 2025 survey performed by an international student placement organization similarly found that more than one in four international students say that they “[have] soured on studying in the U.S.”³⁸

The decline in non-citizen enrollment at American colleges and universities caused by the policy will harm the United States in multiple ways.

A. The Policy Will Harm U.S. Students

The policy threatens to deny American students the many benefits of interactions with non-citizens. A comprehensive report by the Association of International Educators (“NAFSA”) explained that college life provides many American students with their “first close and extensive contacts with foreigners,” helping to prepare them for such interactions over the course of their lives.³⁹ Exposing domestic students to international students on American campuses is especially critical because few domestic students study abroad; in the academic year 2022-2023, less than 2% of domestic students did so.⁴⁰ The NAFSA report also found “ample evidence” that “[i]nternational student enrollments and international teaching assistants enable universities to offer

³⁷ Nathan M. Greenfield, *Interest in studying in US dropped 42% in January*, Univ. World News (Mar. 18, 2025), <https://tinyurl.com/ycxz5pcm>.

³⁸ Liam Knox, *Colleges Fear Decline in International Student Enrollment*, Inside Higher Ed. (Mar. 19, 2025), <https://tinyurl.com/45c5y76m>.

³⁹ *In America’s Interest: Welcoming International Students: Report of the Strategic Task Force on International Student Access* 6, NAFSA (Jan. 2003), <https://tinyurl.com/mr2ak99k>.

⁴⁰ *U.S. Study Abroad*, Open Doors (2024), <https://opendoorsdata.org/annual-release/u-s-study-abroad/> (In 2022-2023, 280,716 American students studied abroad); *Fast Facts 2024* 1, Open Doors (2024), <https://tinyurl.com/39yhec6t> (In 2022-2023, there were 17,904,092 domestic students and 1,057,188 international students for a total of 18,961,280 students at American institutions).

classes to American students that would not otherwise be available.”⁴¹ It stated: “[G]raduate education as we know it could not function without international students.”⁴²

Studies confirm these benefits. A 2013 study, for example, concluded that interaction between American and international students “was consistently and positively correlated with college outcomes and that U.S. students who interacted extensively with international students reported higher levels of engagement in college activities, such as coursework outside the major, contact with faculty outside class, ethnic or cultural clubs or organizations, and visiting speakers.”⁴³ A 2020 study concluded that “foreign students increase the performance of host universities with respect to the graduation numbers of all and native students.”⁴⁴

American students recognize and want these benefits. As the President of an Alliance member institution reports, the institution’s 2023 prospective student survey indicated that the opportunity to learn from faculty with a global perspective, and to learn on a campus with students from around the world were the most important and compelling aspects of the college experience.

By causing a decline in non-citizen enrollments, the policy threatens to deprive American students of these benefits and the opportunity to pursue certain fields. A 2021 National Foundation

⁴¹ *In America’s Interest*, *supra* note 39.

⁴² *Id.*

⁴³ Jiali Luo & David Jamieson-Drake, *Examining the Educational Benefits of Interacting with International Students*, 3 J. Int’l Stud. 85, 87 (2013), <https://tinyurl.com/yvm6p7cp> (compiling studies on the benefits international students provide to domestic students).

⁴⁴ Melaku Abegaz et. al., *Does The Presence of International Students Improve Domestic Graduations in the US?* 75 The Quarterly Rev. Econ. & Fin 95, 98 (Feb. 2020), <https://tinyurl.com/4r3cjp5h>.

for American Policy study concluded that “it would be difficult to maintain important graduate programs without international students,” including in engineering and computer science.⁴⁵

Reducing these interactions will not only harm individual students—it will harm the nation. As a review of the strategic benefits of international student access found: “The ties formed at school between future American and future foreign leaders have facilitated innumerable foreign policy relationships. The millions of people who have studied in the United States over the years constitute a remarkable reservoir of goodwill for our country, perhaps our most undervalued foreign policy asset.”⁴⁶ As former Secretary of Defense Robert Gates recognized, the cross-cultural understanding gained through these interactions is critical to national security:

We cannot begin to understand other countries and deal with security challenges around the world if we don’t have leaders—not just in government but in other sectors as well—who understand those cultures and the history and something about those nations’ interests. And the best way that people can get a foundation for that is by having both direct experience and studying it in school. ... [W]e have had enormous success over the years with students coming to this country, including as adults to professional schools and professional military schools and learning about us.⁴⁷

B. The Policy Is Harming and Will Harm U.S. Colleges and Universities

The policy is hampering the ability of American colleges and universities to carry out their educational missions. Regardless of their individual views on campus political activity, Alliance members are firmly committed to the constitutionally-protected rights of freedom of speech and assembly for citizens and non-citizens. These freedoms are not only central tenets of American

⁴⁵ *International Students in Science and Engineering* 1, National Foundation for American Policy (Aug. 2021), <https://tinyurl.com/4ar264r5>.

⁴⁶ *In America’s Interest*, *supra* note 39 at 5.

⁴⁷ *An Interview with Former Secretary of Defense Robert M. Gates*, NAFSA (2012), <https://tinyurl.com/3pftd4af>.

democracy; they are necessary to create the free academic inquiry at the core of teaching and research at American colleges and universities. By restricting these freedoms, the policy strikes at the heart of American higher education.

The policy is also harming post-secondary institutions by effectively restricting non-citizens' freedom of movement. As Tufts University said: "The free movement of our international community members is ... essential to the functioning of the University and serving our mission. The University has heard from students, faculty and staff who are forgoing opportunities to speak at international conferences and avoiding or postponing international travel."⁴⁸ Some institutions, including the University of California Berkeley⁴⁹ and Brown University⁵⁰ have felt compelled to caution international students against international or even domestic travel.

By revoking students' visas and terminating their SEVIS records without informing their schools, the administration is also preventing colleges and universities from properly advising their non-citizen students on how to comply with federal law and from ensuring their own compliance. University officials said that the "[administration's] tactics are severely limiting universities' options to help students who may be targeted by ICE."⁵¹ "Many [university officials] fretted over how to advise affected students without running afoul of immigration authorities themselves."⁵² One said: "We're in a strange new world where little from past practice seems to apply."⁵³

⁴⁸ Tufts University, *supra* note 2.

⁴⁹ Langin, *supra* note 32.

⁵⁰ Lexi Lonas Cochran, *Brown University Tells International Community to Avoid Foreign Travel*, The Hill (Mar. 17, 2025, 3:06 PM), <https://tinyurl.com/3bpu23xc>.

⁵¹ Knox, *supra* note 15.

⁵² *Id.*

⁵³ *Id.*

In the longer term, declining international student enrollment caused by the policy will financially harm American colleges and universities—a lot. International students are a significant and dependable source of tuition payments: approximately 80% pay full tuition,⁵⁴ and they must demonstrate that they can fund their tuition at the start of each academic year.⁵⁵ In total, they pay tens of billions of dollars in tuition to American universities and colleges every year.⁵⁶ As outlined in Appendix 1, for example, estimated tuition revenues from international students at just the twenty top-ranked universities with the largest international enrollments would be over \$7.3 billion a year—even if the 20% of international students who do not pay full tuition paid nothing.

Higher tuition payments by international students also help boost American student enrollments: A 2017 study found that adding ten international students led to roughly eight additional domestic enrollments.⁵⁷ Lower revenues from international students will limit a school's resources

⁵⁴ Omar Duwaji, *High fees paid by international students help US universities balance their books*, The World (Mar. 28, 2024), <https://tinyurl.com/4w62ecya>.

⁵⁵ Niall Hegarty, *Where We Are Now: The Presence and Importance of International Students to Universities in the U.S.*, 4 J. Int'l Students 223, 227 (2014), <https://tinyurl.com/4vfwa5cy>.

⁵⁶ Annual tuition paid by international students to post-secondary institutions is estimated to be between \$29.8 and \$34.1 billion, assuming that 68% of an international student's economic contribution comes from tuition paid to American post-secondary institutions, see Rajika Bhandari & Patricia Chow, *Report on International Education Exchange* 17, Open Doors (2008), <https://tinyurl.com/kz3pw6sm>, and using NAFSA and Department of Commerce estimates of international students' economic contributions. *International Students Contribute Record-breaking Level of Spending and 378,000 Jobs to the U.S. Economy*, NAFSA (Nov. 18, 2024), <https://tinyurl.com/puskrnbs> ("international students at U.S. colleges and universities contributed \$43.8 billion to the U.S. economy during the 2023-2024 academic year"); Press Release, U.S. Department of State, *Department of State Reports Record High Number of International Students in the United States at Start of International Education Week* (Nov. 18, 2024), <https://tinyurl.com/bdpsdhhh/> (international students' economic contribution was "more than \$50 billion in 2023"). See also John Bound et. al, *The Globalization of Postsecondary Education: The Role of International Students in the US Higher Education System*, 35 J. Econ. Persps. 163, 176 (2021), <https://tinyurl.com/9j5bzs4x>.

⁵⁷ Kevin Shih, *Do International Students Crowd-Out or Cross-Subsidize Americans in Higher Education?*, 156 J. Pub. Econ. 170, 172 (Dec. 2017), <https://tinyurl.com/4f723kdr>.

to offer financial aid to domestic students.⁵⁸ If international student enrollments decline, the tuition lost by American colleges and universities will not be offset by increased domestic enrollment; beginning in 2025, the number of American undergraduates is forecasted to fall due to declining domestic birth rates.⁵⁹

C. The Policy Will Harm the U.S. Economy

By reducing the number of international students in the United States, the policy will harm the American economy. International students do not just contribute to the economy by paying tuition; they increase domestic demand for goods and services, which creates and supports domestic jobs—for every three international students, one U.S. job is created or supported.⁶⁰ Over 1.1 million international students enrolled in American colleges and universities in 2023 contributed more than \$50 billion to the U.S. economy,⁶¹ and supported over 378,000 jobs during the 2023-2024 academic year.⁶² As fewer international students come to the United States, these economic benefits will begin to disappear.

While the full economic impact of the policy cannot yet be quantified, one study provides a helpful benchmark. In January 2024, the Alliance co-published a study on the effects of ending the Optional Practical Training (“OPT”) Program, which allows temporary employment related to international students’ area of study. The study concluded that if the 43% of international students who use OPT decided not to study in the United States because the program ended, it could cost

⁵⁸ *Id.* at 176; *see also* Duwaji, *supra* note 54.

⁵⁹ Emma Dorn et. al, *Higher Education Enrollment: Inevitable Decline or Online Opportunity?*, McKinsey & Co. (Nov. 2020), <https://tinyurl.com/3d9kfsxn>.

⁶⁰ *International Students Contribute Record-breaking Level of Spending*, *supra* note 56.

⁶¹ U.S. Department of State, *supra* note 57.

⁶² *International Students Contribute Record-breaking Level of Spending*, *supra* note 56.

the country \$17.2 billion annually.⁶³ This indicates that even smaller drops in international enrollment caused by the policy could cost the United States billions of dollars per year.

The United States will not just lose the economic benefits that non-citizens would have provided as students—it will lose the benefits that they would have continued to provide as graduates. To take one example, over 70% of international Ph.D. students in STEM fields remain in the United States after graduation and enter the American workforce.⁶⁴ The average foreign-born STEM professional generates a net benefit to the American economy of \$3 million over 20 years,⁶⁵ and foreign-born American STEM talent collectively accounted for 1.7 percent of U.S. Gross Domestic Product in 2019—over \$367 billion.⁶⁶ As fewer non-citizens come to the United States as students, fewer will enter the workforce after graduation, and the American economy will lose out on this economic activity.

D. The Policy Will Harm U.S. Innovation

Reducing non-citizen enrollments will also degrade American research and innovation. A July 2022 study found that immigrants started the majority of American start-up companies

⁶³Dominic Berardi et. al., *Data Snapshot: The Essential Role of Practical Training in U.S. Higher Education and the Innovation Economy* 11, Shorelight (2024), <https://tinyurl.com/yktd3r43> (last accessed Apr. 8, 2025).

⁶⁴ Sandip K. Sureka & James C. Witte, *Immigrant Nobel Laureates: U.S. Higher Education Infrastructure in a Global Context* 2, Inst. for Immigr. Rsch. (Dec. 2024), <https://tinyurl.com/y35rnbff>.

⁶⁵*The Return on Investment of TMF's U.S. STEM Track*, Talent Mobility Fund (Jan. 2025), <https://tinyurl.com/2vv9wsub>

⁶⁶ Keith W. Crane et. al., *Economic Benefits and Losses from Foreign STEM Talent in the United States* iv, Inst. for Defense Analyses (Oct. 2021), <https://tinyurl.com/m2fyaha8>.

valued at \$1 billion or more.⁶⁷ Many of these immigrants started out as international students at American colleges and universities: As one study put it, “[t]he majority came to the United States to study and decided to stay.”⁶⁸ The July 2022 study lists 147 such former non-citizen students who graduated from 75 American colleges and universities and went on to found billion-dollar American companies with an estimated value of over \$586 billion and 80,000 employees.⁶⁹ A list of these entrepreneurs, the colleges they attended, the companies they founded, and the value of those companies is attached as Appendix 2. As non-citizen enrollments decline so too will the number of founders of the next generation of innovative American start-ups.

American technology companies also seek to hire non-citizens who attend American universities and colleges because they cannot find enough domestic STEM talent.⁷⁰ As the Executive Director of Global Detroit said: “When international students help a U.S. employer satisfy hard-to-fill STEM jobs, they allow those employers to better serve existing customers, expand their operations, and grow the business in ways that enable the employer to hire additional workers.”⁷¹ American companies also seek to hire non-citizens because, as one CEO put it, they have “a high motivation and their willingness to work hard overcomes all their obstacles. Success is not an

⁶⁷ Stuart Anderson, *Immigrant Entrepreneurs and U.S. Billion Dollar Companies* 1-3, Nat’l Found. for Am. Pol’y (Jul. 26, 2022), <https://tinyurl.com/3ae3k4yu> (noting that only 14% of America’s billion-dollar companies, as of May 2022, had a majority of native-born founders).

⁶⁸ Vivek Wadhwa et al., *Education and Tech Entrepreneurship* 2, Kauffman (May 2008), <https://tinyurl.com/6kv468m2>.

⁶⁹ Anderson, *supra* note 67 at Table 9.

⁷⁰ *International Students Are U.S. Business’ Best Hope For Growth*, Global Network, <https://tinyurl.com/u2ywvm8m/>.

⁷¹ *Id.*

option for them. It’s a mandated requirement.”⁷² As fewer non-citizens enroll in American colleges and universities, high-tech American businesses will have fewer such workers to hire.

E. The Policy Will Exacerbate a “Brain Drain” from U.S. Schools to Foreign Schools

By repelling non-citizens from enrolling and teaching at American schools, finally, the policy will lead to more of the brightest foreign students attending foreign schools instead of American ones—handing other countries a competitive advantage. For decades, the United States, home to more top-rated colleges and universities than any other country,⁷³ attracted far many more foreign students to its colleges and universities than it sent American students to foreign schools.⁷⁴ Recently, however, America has lost ground to other countries, especially Australia, Canada, and the United Kingdom—while nearly 60% of all inbound international students studied in the United States in 2000, only about 40% studied here in 2022.⁷⁵

The policy will worsen this trend: As non-citizens are deterred from attending American colleges and universities, other countries are taking advantage. China is aggressively recruiting Chinese undergraduates to enroll in its domestic universities instead of going abroad, and recently changed its doctoral matriculation requirements to welcome “PhD refugees from the U.S” to its top universities.⁷⁶ France is explicitly targeting American scientists: Aix Marseille University

⁷² *Id.*

⁷³ *World University Rankings 2025*, Times Higher Educ. (2025), <https://tinyurl.com/2sfftsj8>.

⁷⁴ *Compare International Students, 1948/49-2023/24*, Open Doors Data, <https://tinyurl.com/5by2mjv7/>, with *U.S. Students Studying Abroad, 1989/90-2022/23*, Open Doors Data, <https://tinyurl.com/mpevzavf/>.

⁷⁵ Berardi, *supra* note 63.

⁷⁶ Dannie Peng, *America’s Loss, China’s Gain: Top Chinese Universities Welcome PhD Refugees from the US*, S. China Morning Post (Feb. 23, 2025), <https://tinyurl.com/5fvfkhka>. This will further

rolled out a “Safe Place for Science” program and is receiving a dozen applications a day for 15 openings from American students seeking “scientific asylum”;⁷⁷ its cancer research foundations are similarly welcoming American researchers to their research programs.⁷⁸ In Canada, the province of Quebec announced that it “was actively looking to recruit scientific talent from the U.S. who are wary of ... ‘the climate-skeptic directions that the White House is taking.’”⁷⁹ Policymakers and commentators are calling for Europe⁸⁰ and Australia⁸¹ to do likewise. Several U.S.-based academics have already left the United States for other countries in direct response to the administration’s actions,⁸² including a star faculty member and highly-rated teacher at an Alliance member institution with Lawful Permanent Residency status. This trend will only get worse the longer that the policy remains in effect.

CONCLUSION

The Alliance urges the Court to grant Plaintiffs’ motion for a preliminary injunction.

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America’s decline as a global leader. According to the Global Diplomacy Index, China is already ahead of the U.S. in terms of expanding its diplomatic influence across the world. Ryan Neelam, *Global Diplomacy Index*, Lowy Inst. (2024), <https://tinyurl.com/4m865nu7>.

⁷⁷ Catherine Porter, *As Trump’s Policies Worry Scientists, France and Others Put Out a Welcome Mat*, N.Y. Times (Mar. 26, 2025), <https://tinyurl.com/ycyths83>

⁷⁸ *Id.*

⁷⁹ Alexandra Mae Jones, *A U.S. Brain Drain Could be Canada’s Brain Gain*, CBC (Mar. 30, 2025), <https://tinyurl.com/5xbrd96x>.

⁸⁰ Aitor Hernandez-Morales et al., *Europe to burned American scientists: We’ll take you in*, Politico (Apr. 4, 2025), <https://tinyurl.com/bde2zkar>.

⁸¹ Danielle Cave, *As Trump Sacks Scientists, Australia Should Hire Them. US Drain is Our Brain Gain*, Australian Strategic Pol’y Inst. (Mar. 7, 2025), <https://tinyurl.com/hnz349ny>.

⁸² Andrew Jack, *American Academics Seek Exile as Trump Attacks Universities*, FT (Mar. 31, 2025), <https://tinyurl.com/5xdmhwjj>.

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APPENDIX 1:
International Student Tuition Revenues at Top US Colleges⁸³

| Institution | Total Enrollment ⁱ | % International Students ⁱⁱ | Undergraduate International Students ⁱⁱⁱ | Annual Undergraduate Tuition | Graduate International Students ^{iv} | Annual Graduate Tuition | Estimated Tuition Paid by International Students ^v |
|---|-------------------------------|--|---|------------------------------|---|----------------------------|---|
| Columbia University | 37,954 | 40% | 6319 | \$71,170 ^{vi} | 8863 | \$70,628 ^{vii} | \$860,536,538 |
| New York University | 64,951 | 33% | 8921 | \$62,796 ^{viii} | 12513 | \$56,646 ^{ix} | \$1,015,202,162 |
| MIT | 12,829 | 31% | 1655 | \$61,990 ^x | 2322 | \$61,990 ^{xi} | \$197,226,888 |
| University of Chicago | 21,578 | 31% | 2784 | \$67,446 ^{xii} | 3905 | \$67,200 ^{xiii} | \$360,158,208 |
| California Institute of Technology | 2,518 | 30% | 314 | \$65,622 ^{xiv} | 441 | \$65,706 ^{xv} | \$39,686,323 |
| Georgia Institute of Technology | 53,737 | 29% | 6486 | \$32,938 ^{xvi} | 9098 | \$31,180 ^{xvii} | \$397,842,282 |
| Washington University in St Louis | 18,292 | 27% | 2056 | \$64,500 ^{xviii} | 2883 | \$64,500 ^{xix} | \$254,844,144 |
| Rice University | 9,185 | 27% | 1032 | \$62,874 ^{xx} | 1448 | \$59,784 ^{xxi} | \$121,160,519 |
| University of Southern California | 52,694 | 27% | 5921 | \$69,904 ^{xxii} | 8306 | \$69,904 ^{xxiii} | \$795,640,617 |
| Stanford University | 20,955 | 26% | 2268 | \$65,127 ^{xxiv} | 3181 | \$61,095 ^{xxv} | \$273,605,330 |
| Harvard University | 37,613 | 26% | 4070 | \$56,550 ^{xxvi} | 5709 | \$55,656 ^{xxvii} | \$438,335,892 |
| Johns Hopkins University | 39,399 | 26% | 4263 | \$64,730 ^{xxviii} | 5980 | \$71,203 ^{xxix} | \$561,430,477 |
| Cornell University | 26,510 | 25% | 2758 | \$68,380 ^{xxx} | 3869 | \$20,800 ^{xxxi} | \$215,274,674 |
| Yale University | 16,416 | 24% | 1640 | \$67,250 ^{xxxii} | 2300 | \$49,500 ^{xxxiii} | \$179,301,977 |
| Duke University | 20,664 | 24% | 2064 | \$66,326 ^{xxxiv} | 2895 | \$65,120 ^{xxxv} | \$260,354,223 |
| University of Pennsylvania | 32,205 | 23% | 3083 | \$60,920 ^{xxxvi} | 4324 | \$41,584 ^{xxxvii} | \$294,102,607 |
| Princeton University | 8,946 | 23% | 856 | \$62,400 ^{xxxviii} | 1201 | \$65,910 ^{xxxix} | \$106,087,437 |
| University of Illinois Urbana-Champaign | 62,417 | 22% | 5715 | \$40,712 ^{xl} | 8017 | \$30,356 ^{xli} | \$380,820,827 |
| Brown University | 11,766 | 21% | 1028 | \$68,612 ^{xlii} | 1443 | \$68,608 ^{xliii} | \$135,619,901 |
| UC-San Diego | 44,050 | 20% | 3667 | \$77,886 ^{xliv} | 5143 | \$68,427 ^{xlv} | \$510,019,958 |
| Total | 594,679 | | 66,900 | | 93,842 | | \$7,397,250,985.80 |

⁸³ Based on the twenty institutions on the Forbes Top 50 Colleges list with the highest proportion of international students. Emma Whitford, *Suddenly Colleges With Big Foreign Student Populations Face Existential Risk*, Forbes (Apr. 3, 2025), <https://tinyurl.com/2z9t54yf/>.

ⁱ Whitford, *supra* note 83.

ⁱⁱ *Id.*

ⁱⁱⁱ Assuming 42% of international students are undergraduates. 2024 *Fast Facts* at 1, Open Doors (2024), <https://tinyurl.com/nhhsd3t9> (proportion of international students who are undergraduates was 43% in 2022-2023 academic year and 41% in 2023-2024 academic year).

^{iv} Assuming 58% of international students are graduate students. *Id.* (proportion of international students who are graduates was 57% during 2022-2023 academic year and 59% during 2023-2024 academic year). Because graduate tuition varies by program length and credit requirements, the tuition figure that applies to the broadest range of graduate degrees—the Graduate School of Arts and Sciences or its equivalent—is used as a proxy for graduate school tuition across programs.

^v Assuming 80% of international students pay full tuition. *See* Duwaji, *supra* note 54; Open Doors *supra* note iii. For the purposes of the above table, it is assumed the remaining 20% of international students pay no tuition. When an institution does not list a tuition rate for international students, it is assumed they pay the out-of-state rate (for schools that offer in-state and out-of-state tuition) or baseline tuition (for schools that do not distinguish between in-state and out-of-state students). Where applicable, reduced tuition rates for continuing students are not taken into account. Calculations reflect tuition costs only and exclude additional fees such as housing, meals, health insurance, student activities, and graduate services.

^{vi} *Cost & Aid*, Columbia Undergraduate Admissions, <https://tinyurl.com/3sueks8m>.

^{vii} 2024-2025 *Academic Year Cost of Attendance*, Columbia University Graduate School of Arts and Sciences, <https://tinyurl.com/4fywwy5v>.

^{viii} *Cost of Attendance*, NYU, <https://tinyurl.com/ym5k2b46>.

^{ix} *Graduate Student Expenses*, NYU, <https://tinyurl.com/4pu6sjh8>.

^x *Cost of attendance*, MIT Student Financial Services, <https://tinyurl.com/4v8w4ya2>.

^{xi} *Graduate tuition*, MIT, <https://tinyurl.com/bdz48u3w>.

^{xii} *Undergraduate Costs*, The University of Chicago Financial Aid, <https://tinyurl.com/mt597nsy>.

^{xiii} *Tuition and Fees 2024-25 Social Sciences Division*, UChicago Office of the Bursar, <https://tinyurl.com/3rhmh9r5>.

^{xiv} 2025-2026 *Cost of Attendance*, Caltech Financial Aid, <https://tinyurl.com/mr7ysmv2>.

^{xv} *Graduate Expenses*, Caltech Catalog, <https://tinyurl.com/59huj3br/>.

^{xvi} *Office of Scholarships & Financial Aid*, Georgia Tech, <https://tinyurl.com/3ersfus3>.

^{xvii} *Office of the Bursar*, Georgia Tech, <https://tinyurl.com/ycyy8ret>.

^{xviii} *Cost of Attendance*, WashU Financial Aid, <https://tinyurl.com/yky37vk4>.

^{xix} *Graduate Tuition*, Washington University in St. Louis Arts & Sciences Office of Graduate Studies, <https://tinyurl.com/bdd7h2na>.

^{xx} *Cost of Attendance*, Rice University Office of Financial Aid, <https://tinyurl.com/5bj22hsf>.

^{xxi} *Tuition, Fees, and Expenses*, Rice General Announcements, <https://tinyurl.com/424cehmx>.

^{xxii} *Cost of Attendance*, USC Financial Aid, <https://tinyurl.com/2s4t9xdd>.

^{xxiii} *Cost of Attendance*, USC Financial Aid, <https://tinyurl.com/3mwdvfpb>.

^{xxiv} *Estimate Your Undergraduate Charges*, Stanford Student Services, <https://tinyurl.com/4vzytpa4>.

^{xxv} 2024-2025 *Graduate and Professional Tuition Rates*, Stanford Student Services, <https://tinyurl.com/5y375cr4>.

^{xxvi} *Tuition and Fees*, Harvard Faculty of Arts and Sciences Registrar's Office, <https://tinyurl.com/mrxnhvsa>

^{xxvii} *Cost of Attendance 2024-2025*, Harvard Kenneth C. Griffin Graduate School of Arts and Sciences, <https://tinyurl.com/yxj426zb>.

^{xxviii} *Cost & Tuition*, Johns Hopkins University, <https://tinyurl.com/4stzxsrf>.

^{xxix} *Cost of Attendance*, Johns Hopkins Krieger School of Arts and Sciences, <https://tinyurl.com/57u49ka7>.

^{xxx} *Cost to Attend*, Cornell Financial Aid, <https://tinyurl.com/37ffrcu>.

^{xxxi} *Tuition Rates by Field*, Cornell University Graduate School, <https://tinyurl.com/3ue7c2cb>.

^{xxxii} *Financial Aid*, Yale University, <https://tinyurl.com/2mn9vasw>.

^{xxxiii} *Tuition and Fees*, Yale Graduate School of Arts and Sciences, <https://tinyurl.com/47dbxk5p>.

^{xxxiv} *Cost of Attendance*, Duke Karsh Office of Undergraduate Financial Support, <https://tinyurl.com/4uayrbwv>.

^{xxxv} *Tuition, Fees, and Ph.D. Stipends*, Duke The Graduate School, <https://tinyurl.com/3z5vdydh>

^{xxxvi} *Undergraduate Cost of Attendance*, University of Pennsylvania Student Registration & Financial Services, <https://tinyurl.com/4vw228sj>.

^{xxxvii} *Tuition and Fees*, Penn LPS College of Liberal & Professional Studies, <https://tinyurl.com/3h2e6rc8>.

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- ^{xxxviii} *Cost & Aid*, Princeton University Undergraduate Admission, <https://tinyurl.com/2ur39c4u>.
- ^{xxxix} *Funding Calendar, University Rates & Costs*, Princeton The Graduate School, <https://tinyurl.com/mr2jaeu3>.
- ^{xl} *Tuition*, University of Illinois Urbana-Champaign, Undergraduate Admissions, <https://tinyurl.com/bdhrv8bw>.
- ^{xli} *2024-2025 Academic Year Graduate & Professional Tuition Rates*, University of Illinois Urbana-Champaign Office of the Registrar, <https://tinyurl.com/54sxt83m>.
- ^{xlii} *Cost of Attendance*, Brown Undergraduate Financial Aid, <https://tinyurl.com/46t4j57c>.
- ^{xliii} *Cost of Attendance by Program*, Brown Graduate Student Funding and Support, <https://tinyurl.com/3tfs7wz7>.
- ^{xliv} *Continuing Undergraduates Fall 2024 Cohort*, UC San Diego, Financial Aid & Scholarships, <https://tinyurl.com/4crn5h6s>.
- ^{xlvi} *Graduate Students 2024-2025*, UC San Diego, Financial Aid & Scholarships, <https://tinyurl.com/yck6y7mx>.

APPENDIX 2:
International Students Who Became Founders of U.S. Billion-Dollar Companies⁸⁴

| Name | University/Degree | Company Founded/ Cofounded | Employees | Value of Company |
|-------------------|--|-------------------------------|-----------|------------------|
| Wemimo Abbey | UC Berkeley, B.A., Public Policy, NYU, MPA | Esusu | 91 | \$1.0 Billion |
| Harish Abbott | Univ. of Illinois Urbana Champaign, M.S. Operations Research, Stanford University, MBA | Deliverr | 462 | \$2.1 Billion |
| Godard Abel | MIT, B.S. & M.S. Engineering, Stanford, MBA | G2 | 810 | \$1.10 Billion |
| Noubar Afeyan | MIT, Ph.D. Biochemical Eng. | Indigo Ag | 2,422 | \$3.5 Billion |
| Milind R Agarwal | Michigan State, MBA | GupShup | 1,200 | \$1.4 Billion |
| Olugbenga Agboola | MIT, MBA | Flutterwave | 465 | \$3.0 Billion |
| Francesco Agosti | Duke, B.S. Comp. Sci. | Phantom | 50 | \$1.20 Billion |
| Ikkjin Ahn | UPENN M.S. Engineering, UC San Diego, Ph.D. Comp. Sci. | MOLOCO | 300+ | \$1.5 Billion |
| Sri Satish Ambati | Univ. of Memphis, M.S. Math & Comp. Sci. | H2O.ai | 347 | \$1.7 Billion |
| Mohit Aron | Rice, Ph.D. & M.S. Comp. Sci. | Cohesity | 1,900 | \$3.7 Billion |
| Krste Asanovic | UC Berkeley, Ph.D. Comp. Sci. | SiFive | 455 | \$2.5 Billion |
| Karim Atiyeh | Harvard, M.S. Comp. Sci., B.S. Elec. & Comp. Eng. | Ramp Financial | 238 | \$3.9 Billion |
| Tope Awotona | Univ. of Georgia, Mng. Info. Systems | Calendly | 400+ | \$3.0 Billion |
| Ignacio Bachiller | MIT, M.S. Mechanical Engineering | Fever Labs | 935 | \$1.0 Billion |
| Aravind Bala | Ohio State, M.S. Comp. Sci. | SeekOut | 158 | \$1.2 Billion |
| Hari Balakrishnan | UC Berkeley, Ph.D. Comp. Sci. | Cambridge Mobile Telematics | 401 | \$1.5 Billion |
| Nasser Barghouti | Columbia Univ., B.S. & Ph.D. Comp. Sci. | Seismic | 1,500 | \$3.0 Billion |
| Mikhail Bautin | Stony Brook Univ., Ph.D. Comp. Sci. | <u>YugaByte</u> | 327 | \$1.3 Billion |
| Hari Bayireddy | Temple Univ., MBA, Wharton School, Business Strategy | Phenom People | 1,352 | \$1.4 Billion |
| Mahe Bayireddi | Penn State, Bus. Planning & Accounting, Wharton School, Bus. Strategy | Phenom People | 1,352 | \$1.4 Billion |

⁸⁴ Source: Anderson, *supra* note 67.

| Name | University/Degree | Company Founded/ Cofounded | Employees | Value of Company |
|------------------|--|-------------------------------|-----------|------------------|
| Ali Behnam | UC San Diego, B.S. Structural Eng., UCLA, MBA | Tealium | 704 | \$1.2 Billion |
| Jeroen Bekaert | Stanford, M.S. Bus. and Management | Orca Bio | 91 | \$1.0 Billion |
| Sanjay Beri | Stanford, M.S. Elec. Eng. | Netskope | 1,500+ | \$7.5 Billion |
| Anant Bhardwaj | Stanford, M.S. Comp. Sci., MIT, Ph.D. Comp. Sci. | Instabase | 277 | \$1.05 Billion |
| Pedro Bizarro | Univ. of Wisconsin-Madison, M.S. & Ph.D. Comp. Sci. | Feedzai | 620 | \$1.0 Billion |
| Alex Blania | Caltech, Visiting Student, Physics | Worldcoin | 98 | \$1.0 Billion |
| Martin Blencowe | Univ. of Southern California | Cameo | 336 | \$1.0 Billion |
| Samir Bodas | NC Wesleyan Univ., Univ. Texas, Austin, B.A. Comp. Sci., UPENN Wharton, MBA | Icertis | 2,100 | \$5 Billion |
| Alex Bouaziz | MIT, M.S. Civil & Envir. Eng. | Deel | 1,000 | \$5.5 Billion |
| Mili Bustamante | Stanford, MBA | Jokr | 200 | \$1.20 Billion |
| Cesar Carvalho | Harvard, MBA | Gympass | 1,400 | \$2.2 Billion |
| Daniel Gershuni | NYU, B.S. Bus. & Info. Systems | OwnBackup | 704 | \$3.35 Billion |
| Viral Bajaria | USC | 6Sense | 1,250 | \$5.2 Billion |
| Adam Bowen | Pomona College, B.S. Physics, Stanford, MSME Product Design | JUUL Labs | 1,474 | \$12 Billion |
| Bruce Buchanan | UCLA, MBA | Rokt | 342 | \$1.95 Billion |
| Felipe Capella | Wharton School, Law & Business, UPENN Law School, L.M.M. Law | Loadsmart | 569 | \$1.3 Billion |
| Michael Carvin | Princeton, B.A. Economics | SmartAsset | 300 | \$1.0 Billion |
| Jaswinder Chadha | Univ. of Texas El Paso, M.S. Industrial Engineering, Texas A&M, Ph.D., Operations Research | Axtria | 2,463 | \$1.0 Billion |
| Navdeep Chadha | Univ. of Texas El Paso, M.S. Comp Sci. | Axtria | 2,463 | \$1.0 Billion |
| Adam Chekroud | Yale, Ph.D., Psychology & Neuroscience | Spring Health | 441 | \$2.0 Billion |
| Jiang Chen | Yale, Ph.D. Comp. Sci. | Moveworks | 456 | \$2.1 Billion |
| Ariel Cohen | Northwestern, EMBA | TripActions | 2,200 | \$7.25 Billion |
| Shay Cohen | Univ. of Delaware, M.S. Biomechanics, Mechanical Engineering | Fabric | 100 | \$1.0 Billion |
| John Collison | Harvard | Stripe | 7,000+ | \$95 Billion |
| Patrick Collison | MIT | Stripe | 7,000+ | \$95 Billion |
| Liron Damri | Stanford, Finance and Strategic Market. | Forter | 500 | \$3.0 Billion |
| Monish Darda | Florida Atlantic Univ., M.S. Mech. Eng. | Icertis | 2,100 | \$5 Billion |

| Name | University/Degree | Company Founded/Cofounded | Employees | Value of Company |
|----------------------------|---|---------------------------|-----------|------------------|
| Raj De Datta | Princeton, B.S.E. Elec. Eng., Harvard, MBA | Bloomreach | 850 | \$2.2 Billion |
| Nicolas Desmarais | Amherst, B.A. Economics & Pol. Sci. | AppDirect | 661 | \$1.10 Billion |
| Dave Ferguson | Carnegie Mellon, M.S. & Ph.D. Robotics | Nuro | 1,300 | \$8.6 Billion |
| Rich Ford | Univ. of Chicago, MBA | Roofstock | 670 | \$1.94 Billion |
| Luca Foschini | UC Santa Barbara, M.S. Comp. Security, Ph.D. Comp. Sci. | Evidation | 441 | \$1.0 Billion |
| Venky Ganti | Univ. of Wisconsin-Madison, Ph.D. Comp. Sci. | Alation | 650 | \$1.2 Billion |
| Ashutosh Garg | Univ. of Ill., Urbana-Champaign, Ph.D. Elec. & Comp. Engineering | Eightfold.ai | 475 | \$2.1 Billion |
| Ashutosh Garg | Univ. of Ill., Urbana-Champaign, Ph.D. Elec. & Comp. Engineering | Bloomreach | 850 | \$2.2 Billion |
| Kam Ghaffarian | Capitol Tech. Univ., B.S. Elec. Eng., Catholic Univ., B.S. Engineering, George Washington, M.S. Info. Tech. | Axiom Space | 500 | \$1.0 Billion |
| Elram Goren | Carnegie Mellon, Exchange Student | Fabric | 100 | \$1.0 Billion |
| Chakri Gottemukkala | UCLA, M.S. Engineering | o9 Solutions | 1,853 | \$2.7 Billion |
| Ronghui Gu | Yale, Ph.D. Comp. Sci. | CertiK | 163 | \$2.0 Billion |
| Divey Gulati | Univ. of Illinois Urbana-Champaign, B.S. Comp. Eng., MBA | ShipBob | 1,200 | \$1.0 Billion |
| Anoop Gupta | Carnegie Mellon, Ph.D. Comp. Sci. | SeekOut | 158 | \$1.20 Billion |
| Robert Ha | MIT, B.S. Electrical Engineering | Splashtop | 326 | \$1.0 Billion |
| Guru Hariharan | Univ. of Texas, Austin, M.S. Elec. & Comp. Eng., Wharton, MBA | CommerceIQ | 252 | \$1.0 Billion |
| Kanav Hasija | Univ. of New Hampshire, M.A. Patent Law | Innovaccer | 1,237 | \$3.2 Billion |
| Francisco Hein | St. John's Univ., MBA | Fever Labs | 935 | \$1.0 Billion |
| David Hindawi | U.C.-Berkeley, Ph.D. Oper. Research | Tanium | 2,200 | \$9 Billion |
| Amir Husain | Univ. of Texas, Austin, B.S. Comp. Sci. | SparkCognition | 400 | \$1.4 Billion |
| Sami Inkinen | Stanford, MBA | Virta Health | 441 | \$2.0 Billion |
| Rotem Iram | Harvard, MBA | At-Bay | 208 | \$1.35 Billion |
| Roman Itskovich | Harvard, MBA | At-Bay | 208 | \$1.35 Billion |
| Arvind Jain | Univ. of Washington, M.S., Comp. Sci. | Rubrik | 2,334 | \$4 Billion |
| Graham Jenkin | Univ. of Mass, Amherst, Exchange Student | CoinList | 150 | \$1.5 Billion |

| Name | University/Degree | Company Founded/ Cofounded | Employees | Value of Company |
|------------------------------|---|-------------------------------|-----------|------------------|
| Patricio Jutard | Harvard Bus. School, Stanford, Global Leadership Program | MURAL | 925 | \$2.0 Billion |
| Varun Kacholia | UC Berkeley, M.S. Comp. Sci. | Eightfold.ai | 475 | \$2.1 Billion |
| Tilli Kalisky-Bannett | MIT, MBA | At-Bay | 208 | \$1.35 Billion |
| Filip Kaliszan | Stanford, B.S. & M.S. Comp. Sci. | Verkada | 1,000 | \$1.6 Billion |
| Oren Kaniel | Wharton School, MBA | AppsFlyer | 1,461 | \$2.0 Billion |
| Chaitanya Kanojia | Northeastern Univ., M.S. Comp. Systems Engineering | Starry | 750 | \$1.29 Billion |
| Vikram Kapoor | Univ. of Minnesota, M.S. Comp. Sci. | Lacework | 1,000+ | \$8.3 Billion |
| Kohsuke Kawaguchi | Baruch College, BBA Bus. & Admin. | CloudBees | 600 | \$1.15 Billion |
| Osman Kibar | UC-San Diego, M.S. and Ph.D., Biophotonics and Optoelectronics, Caltech, B.S. EE, Pomona College, B.A. Mathematical Econ. | Biosplice Therapeutics | 100 | \$12 Billion |
| Roger Kjensrud | UC Santa Barbara, M.S. EE | Impact | 990 | \$1.5 Billion |
| Vijay Krishnan | Stanford, M.S. Comp. Sci. | Turing | 575 | \$1.10 Billion |
| Sudheer Koneru | UT Austin, M.S. Comp. Sci. | Zenoti | 1,000 | \$1.5 Billion |
| Manu Kumar | Stanford, Ph.D. and M.S. Comp Sci, Carnegie Mellon, M.S. and B.S. Software Eng., Elec. & Comp. Eng. | Carta | 1,618 | \$7.4 Billion |
| Mark Lee | MIT, B.S. Elec. Eng., M.S. Comp. Sci. & Elec. Eng. | Splashtop | 326 | \$1.0 Billion |
| Yunsup Lee | UC Berkeley, M.S. & Ph.D. Comp. Sci. | SiFive | 455 | \$2.5 Billion |
| Arad Levertov | Duke, MBA | Sunbit | 405 | \$1.10 Billion |
| Natan Linder | MIT, M.S., Ph.D. Media Arts & Sciences | Formlabs | 768 | \$2.0 Billion |
| Larry Liu | UC Davis, MBA | Weee! | 388 | \$2.80 Billion |
| Tom Livne | Yale, MBA | Verbit | 600 | \$2.0 Billion |
| Tomer London | Stanford, M.S. Electrical Engineering | Gusto | 2,000+ | \$1.1 Billion |
| Joseph Lubin | Princeton Univ., B.S. Elec. Eng. & Comp. Sci. | ConsenSys | 755 | \$3.2 Billion |
| Max Lytvyn | Vanderbilt, MBA | Grammarly | 700+ | \$15 Billion |
| Chris Mansi | Stanford, MBA | Viz.ai | 312 | \$1.20 Billion |
| Augusto Marietti | UC Berkeley, Intl. Economics | Kong | 448 | \$1.4 Billion |
| Paulo Marques | Carnegie Mellon Univ., Software Eng. | Feedzai | 620 | \$1.0 Billion |
| Ignacio Martinez | Purdue Univ., Agribusiness Leadership Plus | Indigo Ag | 2,422 | \$3.5 Billion |
| Ignacio Martinez | Purdue Univ., Agribusiness Leadership Plus | Inari | 230 | \$1.2 Billion |

| Name | University/Degree | Company Founded/ Cofounded | Employees | Value of Company |
|------------------------------|---|-------------------------------|-----------|------------------|
| Rakesh Mathur | Univ. of Texas at Arlington, M.S. Industrial Engineering & Operations Research | GupShup | 1,200 | \$1.4 Billion |
| Soham Mazumdar | Univ. of Illinois, Urbana Champaign, M.S. Comp. Sci. | Rubrik | 2,334 | \$4 Billion |
| Rick McPhee | UC Berkeley, EAP Comp. Sci. | Upside | 300 | \$2.5 Billion |
| Manny Medina | Harvard, MBA, Univ. of Penn., M.S. Comp. Sci., Stevens Inst. Tech., B.S. Comp. Eng. | Outreach | 1,225 | \$4.4 Billion |
| Abhishek Mehta | Univ. of Virginia, M.A. Banking Management | Tresata | 70 | \$1.0 Billion |
| Domingo Mihovilovic | Stanford, M.S. Comp. Sci., Elec. Eng., Ph.D. Elec. Eng. | Exabeam | 594 | \$2.4 Billion |
| Mikita Mikado | Univ. of Hawaii, Comp. Sci., English, Japanese | PandaDoc | 390 | \$1.0 Billion |
| Keyvan Mohajer | Stanford, Ph.D. Elec. Eng. | SoundHound | 385 | \$1.0 Billion |
| Fayez Mohamood | NJIT, B.S. Comp. Engineering, Georgia Tech, M.S. Elec. & Comp. Engineering | Bluecore | 448 | \$1.0 Billion |
| Philipp Moritz | UC Berkeley, Ph.D. Comp. Sci. | Anyscale | 100 | \$1.0 Billion |
| Richard Morris | Wharton, MBA | Tresata | 70 | \$1.0 Billion |
| Maijid Moujaled | Grinnell, B.A. Comp. Sci. | Chipper Cash | 267 | \$2.0 Billion |
| Elon Musk | Univ. of Penn., B.A., Econ & Physics, Wharton School, B.S. Business | SpaceX | 12,000 | \$100.3 Billion |
| Elon Musk | Univ. of Penn., B.A., Econ & Physics, Wharton School, B.S. Business | OpenAI | 250 | \$2.92 Billion |
| Elon Musk | Univ. of Penn., B.A., Econ & Physics, Wharton School, B.S. Business | The Boring Company | 197 | \$5.7 Billion |
| Kannan Muthukkaruppan | UC Berkeley, M.S. Comp. Sci. | YugaByte | 327 | \$1.3 Billion |
| Sashi Narahari | Univ. of Maryland, M.S. Mech. Eng. | HighRadius | 3,635 | \$3.10 Billion |
| Krishna Narayanaswamy | Rensselaer Polytechnic Institute, M.S. Comp. & Sys. Eng. | Netskope | 1,500+ | \$7.5 Billion |
| Sergiu Nedeveschi | UC-Berkeley, M.S. & Ph.D. Comp. Sci. | Tarana Wireless | 279 | \$1.0 Billion |
| Aurelian Nicolae | Harvard, B.S. Mech. Eng. & Mat. Sci. | WHOO | 330 | \$3.6 Billion |
| Feng Niu | Univ. of Miami, Computer Vision | Alation | 650 | \$1.2 Billion |
| Vaibhav Nivargi | Stanford, M.S. Comp. Sci. | Moveworks | 456 | \$2.1 Billion |

| Name | University/Degree | Company Founded/ Cofounded | Employees | Value of Company |
|----------------------------|---|-------------------------------|-----------|------------------|
| Kunle Olukotun | Univ. of Michigan, Ph.D. Comp. Eng. | SambaNova Systems | 144 | \$5 Billion |
| Aly Orady | Stanford, M.S., E.E. Comp. Architecture, Networking | Tonal | 790 | \$1.6 Billion |
| Bilal Orhan | Univ. of Central Florida, M.S. Comp. Sci. | Rec Room | 200+ | \$3.5 Billion |
| Hubert Palan | UC Berkeley, MBA | Productboard | 400 | \$1.7 Billion |
| Rabin Patra | UC Berkeley, Ph.D. Comp. Sci. | Tarana Wireless | 279 | \$1.0 Billion |
| James Peng | Stanford, Ph.D., Univ. Buffalo, M.S. | Pony.ai | 1,000 | \$5.3 Billion |
| German Peralta | Cornell, MBA | Jokr | 200 | \$1.20 Billion |
| Artem Petakov | Princeton, B.A. Comp. Sci., Finance | Noom | 2,090 | \$3.7 Billion |
| Amit Prakash | Univ. of Texas-Austin, Ph.D. Comp. Eng. | ThoughtSpot | 731 | \$4.2 Billion |
| Dhiraj Rajaram | Wayne State, M.S. Computer Engineering, Univ. of Chicago, MBA | Mu Sigma | 2,665 | \$1.5 Billion |
| Rajesh Ramanand | Tulane Univ., B.S. Comp. Sci. | Signifyd | 400+ | \$1.34 Billion |
| Daniel Ramot | Stanford, Ph.D. Neuroscience | Via | 1,000 | \$3.3 Billion |
| Venkat Rangan | Univ. of Miami, M.S. Comp. Sci. | Clari | 600+ | \$2.6 Billion |
| Karthik Ranganathan | Univ. of Texas, Austin, M.S. Comp. Sci. | YugaByte | 327 | \$1.3 Billion |
| Prabhakar Reddy | Harvard, MBA | FalconX | 165 | \$3.75 Billion |
| Tal Riesenfeld | Harvard, MBA | Sunbit | 405* | \$1.10 Billion |
| Oleg Rogynskyy | Boston Univ., B.A., Bus. Admin., Pol. Sci., Intl. Relations, Econ. | People.ai | 294 | \$1.10 Billion |
| Martin Roscheisen | Stanford, Ph.D., Comp. Sci. | Diamond Foundry | 300 | \$1.8 Billion |
| Israel Roth | Columbia, MBA | K Health | 360 | \$1.5 Billion |
| Philippe Saint-Just | Univ. of Alabama, B.S. Comp. Sci. | REEF Technology | 2,288 | \$1.0 Billion |
| Daniel Saks | Harvard, M.A. Finance & Accounting | AppDirect | 661 | \$1.10 Billion |
| Dhruv Saxena | Purdue Univ., B.A. & M.S. Elec. Eng. | ShipBob | 1,200 | \$1.0 Billion |
| Susanne Schöneberg | UC-Berkeley, MBA | Flexport | 2,573 | \$3.2 Billion |
| Mada Seghete | Cornell, B.S. Elec & Comp. Eng., Stanford, M.S. Manag. Sci. & Eng., MBA | Branch | 466 | \$4.0 Billion |
| Ham Serunjogi | Grinnell, B.A. Econ. | Chipper Cash | 267 | \$2.0 Billion |
| Rohan Seth | Stanford, M.S. Mang. Sci. & Eng., B.S. Comp. Sci. | Clubhouse | 99 | \$4 Billion |
| Eric Setton | Stanford, Ph.D. and M.S. Electrical Engineering | Tango | 399 | \$1.10 Billion |
| Premal Shah | USC, M.S. Comp. Sci. | 6Sense | 1,250 | \$5.2 Billion |
| Zhong Shao | Princeton, Ph.D. Comp. Sci. | CertiK | 163 | \$2.0 Billion |

| Name | University/Degree | Company Founded/ Cofounded | Employees | Value of Company |
|---------------------------|--|-------------------------------|-----------|------------------|
| Tomer Shiran | Carnegie Mellon Univ., M.S. Comp. Eng. | Dremio | 350 | \$2.0 Billion |
| Beerud Sheth | MIT, M.S. Comp. Sci | GupShup | 1,200 | \$1.4 Billion |
| Hitesh Sheth | Univ. of Texas, Austin, B.A. Comp. Sci. | Vectra AI | 550 | \$1.2 Billion |
| Tim Shi | Stanford, Ph.D. candidate, Machine Learning | Cresta | 150 | \$1.6 Billion |
| Eyal Shinar | Wharton School, MBA | Fundbox | 300+ | \$1.10 Billion |
| Jonathan Siddharth | Stanford, M.S. Comp. Sci. | Turing | 575 | \$1.10 Billion |
| Alessio Signorini | Univ. of Iowa, Ph.D. Artificial Intelligence & Epidemiology | Evidation | 441 | \$1.0 Billion |
| Davis Siksnans | Univ. of Wisconsin Eau Claire, Information Systems | Printful | 1,700 | \$1.0 Billion |
| Varun Singh | UCLA, M.S. Eng. & Applied Eng., Univ. of MD, Ph.D. Eng. & Des. Optimization | Moveworks | 456 | \$2.1 Billion |
| Bipul Sinha | Wharton School, MBA | Rubrik | 2,334* | \$4 Billion |
| Agustin Soler | Northwestern, M.S. Industrial and Product Design | MURAL | 925* | \$2.0 Billion |
| Ion Stoica | Carnegie Mellon Univ., M.S. Comp. Sci., Ph.D. Elec. and Comp. Engineering | Anyscale | 123 | \$1.0 Billion |
| Ion Stoica | Carnegie Mellon Univ., M.S. Comp. Sci., Ph.D. Elec. and Comp. Engineering | Databricks | 3,000+ | \$38 Billion |
| Vijay Tella | UCLA, M.S. Comp Sci | Workato | 825 | \$5.2 Billion |
| Rich Teo | Univ. of Mich., Bachelor of Bus. Admin. | Paxos | 250 | \$2.4 Billion |
| Martin Tolar | Univ. of Cincinnati College of Medicine, Ph.D. Neuroscience, Univ. of Michigan, Exec. Management | Alzheon | 25 | \$1.31 Billion |
| Uma Valeti | Mayo Clinic, Cardiology, Wayne State & State Univ. of NY, Buffalo, Internal Medicine | UPSIDE Foods | 195 | \$1.0 Billion |
| Nagarjuna Venna | MIT, M.S. | BitSight Technologies | 650 | \$2.4 Billion |
| Romesh Wadhvani | Carnegie Mellon, M.S., Ph.D. Elec. Eng. | ConcertAI | 995 | \$1.9 Billion |